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STATE OF NEW JERSEY  
DIVISION OF GAMING ENFORCEMENT  
DOCKET NO. 12-0786-VC

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STATE OF NEW JERSEY,  
DEPARTMENT OF LAW AND  
PUBLIC SAFETY, DIVISION OF  
GAMING ENFORCEMENT,

Complainant,

v.

BOARDWALK REGENCY  
CORPORATION, LLC, d/b/a  
Caesars Hotel and Casino,

Respondent.

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Civil Action

COMPLAINT

Complainant, State of New Jersey, Department of Law and Public Safety,  
Division of Gaming Enforcement ("Division"), located at 1300 Atlantic Avenue, Atlantic  
City, New Jersey, 08401 says:

**(Failure to Conduct Inspection of Count Room)**

1. Respondent, BOARDWALK REGENCY CORPORATION d/b/a CAESARS ATLANTIC CITY ("Caesars") is a New Jersey corporation having its principal place of business at 2100 Pacific Avenue, Atlantic City, New Jersey 08401.

2. Caesars is the holder of a plenary casino license first issued by the on October 25, 1980 and continuously renewed thereafter. At all times relevant herein, Caesars was authorized to conduct casino gaming within its casino hotel facility.

3. N.J.A.C. 13:69D-1.33, which was promulgated as a temporary "emergency" regulation and was in effect at all times relevant herein, provides, in pertinent part:

(i) After the contents of all drop boxes or all slot cash storage boxes have been counted:

8. A count room employee shall conduct a thorough inspection of the entire count room and all counting equipment located therein to verify that no cash, tokens, gaming chips, gaming vouchers, or coupons remain in the room and shall certify the foregoing in a writing which shall be filed with the Division.

4. N.J.A.C. 13:69D-1.33(u), which has been promulgated since the effective period of the emergency regulation in paragraph 3, above, and is now in effect, provides:

(u) A count room employee shall conduct a thorough inspection of the entire count room and all counting equipment located therein to verify that no cash, tokens, gaming chips, gaming vouchers, or coupons remain in the room and shall certify the foregoing in a writing which shall be filed with the Division.

5. On September 13, 2011, at approximately 8:30 a.m., Caesars in-house cage technician entered the soft count room to resolve a problem with counting machine "B". While diagnosing the problem, the cage technician followed the acceptable procedure for a test by removing the cover around the transport area where currency, vouchers, and coupons are inserted into the counting machine to be run for verification.

6. On September 13, 2011, at approximately 9:04 a.m., counting machine "B" malfunctioned causing money, vouchers and coupons to be ejected out of the transport area of the machine. In their effort to physically contain the money, vouchers and coupons, the cage technicians inadvertently caused those items to be knocked back into the machine in such positions that the machine did not recognize their presence.

7. On September 13, 2011, at approximately 12:10 p.m., Caesars soft count personnel completed the table game and bill changer count for the gaming day.

8. At approximately 3:50 p.m., during a routine maintenance of the counting machines in Caesars soft count room, outside technicians employed by the counting machines' manufacturer and Caesars in-house technicians discovered the following items in counting machine 'B': \$244.79 in gaming vouchers, \$46 in cash, and \$7 in coupons.

9. Based upon the information in Paragraphs 1 through 8 above, Caesars, through its count room personnel, failed to conduct a thorough inspection of the entire count room and all accounting equipment therein to verify that no cash, tokens, gaming chips, gaming vouchers, or coupons remained in the room as required by formerly N.J.A.C. 13:69D-1.33(i)8, and currently by N.J.A.C. 13:69D-1.33(u).

WHEREFORE, Complainant demands the following relief against Respondent, Caesars:

A. Judgment that on September 13, 2011 Caesars, through its by its count room personnel, failed to conduct a thorough inspection of the entire count room and all accounting equipment therein to verify that no cash, tokens, gaming chips, gaming vouchers, or coupons remained in the room in violation of then N.J.A.C. 13:69D-1.33(i)8 and currently N.J.A.C. 13:69D-1.33(u);

B. Judgment imposing against Caesars a civil monetary penalty,  
pursuant to N.J.S.A. 5:12-129(5);

C. Judgment imposing against Caesars such other and further relief  
as may be deemed just and appropriate under the circumstances.

Respectfully submitted,

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Attorney for Complainant

By: 

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Dated: October 19, 2012